

EXHIBIT 4

Videotaped Deposition of
Elizabeth Pelletier
March 09, 2023

Freeman

vs.

Deebs

Confidential



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Freeman vs.
Deebs

Elizabeth Pelletier

1 there are no phones ringing that nobody is not -- not
2 addressed in the book.

3 You want to make sure that there are no
4 continuity issues, no blocking issues where you have
5 like character one minute is standing and the next
6 minute they're sitting, hair is in a ponytail and now
7 it's not.

8 Smooth out characterization. You want to
9 make sure that the character at the beginning of the
10 book halfway through hasn't changed to a different
11 character or made decisions that are authentic to that
12 character. Yeah, you just -- and then, you know,
13 you're drilling down each successive time that you're
14 looking at the manuscript, getting more and more into
15 the granularity of -- of the words that are used, could
16 a stronger verb be used here to convey more emotion,
17 things like that.

18 **Q. Now, what did you do as the content editor on**
19 **the Crave books?**

20 A. All of that.

21 **Q. Who is the distributor of the Crave book**
22 **series for print and eBooks?**

23 A. Macmillan.

24 **Q. What rights specifically does Macmillan have?**

25 A. They have the right to distribute the books.

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1 Q. In what formats?

2 A. Print and E in English.

3 Q. And what territory?

4 A. Can you clarify if you are referring to the
5 Crave book or the Crave series?

6 Q. I'm referring -- well, I'm referring to the
7 agreement. I'll change that.

8 The agreement you have with Macmillan,
9 what territory does it include?

10 MS. WOLFF: Object to the form. You can
11 answer. It's ambiguous.

12 THE WITNESS: It is.

13 A. Are you asking any book or specifically the
14 Crave books?

15 Q. I'm asking any -- is it correct you have just
16 reached an agreement with --

17 A. Yes, the distribution agreement -- sorry.

18 Q. And is that for all of the books in
19 Entangled's catalog?

20 A. It is.

21 Q. [REDACTED]

22 [REDACTED]

23 A. [REDACTED]

24 [REDACTED]

25 Q. [REDACTED]

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1 [REDACTED]
2 A. [REDACTED]
3 Q. [REDACTED]
4 A. [REDACTED]
5 [REDACTED]
6 Q. [REDACTED]
7 A. [REDACTED]
8 Q. [REDACTED]
9 [REDACTED]
10 A. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 Q. [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 A. [REDACTED]
17 Q. [REDACTED]
18 MS. WOLFF: Wait for him to finish the
19 question.
20 THE WITNESS: Sorry.
21 MS. WOLFF: Otherwise, someone, like the
22 Court reporter --
23 THE WITNESS: Sorry, Donna.
24 MS. WOLFF: -- will become schizophrenic.
25 Q. [REDACTED]

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1 THE REPORTER: Something to do with what?

2 THE WITNESS: Antipiracy.

3 Q. Are you aware of any other amendments to the
4 distribution agreement with Macmillan other than the
5 ones I showed you just now?

6 A. I am not.

7 Q. Who is RightsMix?

8 A. RightsMix is the agency that handles our
9 foreign rights sales for Entangled Teen.

10 Q. When you say foreign rights sales, are you
11 talking about foreign language editions?

12 A. I am.

13 Q. So if it was an English print version of the
14 book, that would be distributed by Macmillan, correct?

15 A. That is not correct.

16 Q. So why is that an incorrect statement?

17 A. Because technically British UK is considered a
18 foreign language.

19 Q. So under the Macmillan distribution agreement,
20 they don't have rights to distribute books written in
21 English in the UK?

22 MS. WOLFF: Object to the form. You can
23 answer. It's confusing.

24 Q. Well, is it fair to say that what you're
25 saying is that Macmillan distribution agreement doesn't

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1 include the territory of the United Kingdom?

2 A. [REDACTED]

3 Q. Then why is that territory different than
4 other territories outside of the United States?

5 A. So if I -- if I may.

6 Q. Yes.

7 A. When you sell a right to a book to another
8 publisher, you're granting them the right to publish
9 that book in that language. The UK is a language that
10 we can license rights to sell a book in the British UK.
11 If I have not licensed those said rights, I can
12 distribute in English through Macmillan around the
13 world in every territory, including the United Kingdom.

14 Q. [REDACTED]
15 [REDACTED]

16 A. [REDACTED]
17 [REDACTED]

18 Q. That's fine. Thank you.

19 Who is Rebecca Mancini?

20 A. She's the agent and owner of RightsMix.

21 Q. Okay. And do you have a written agreement
22 with RightsMix?

23 A. I don't know.

24 Q. And what specifically is RightsMix authorized
25 to license?

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1 chapter titles?

2 A. Not many books have chapter titles. So --

3 Q. Approximately how many books have you -- has
4 Entangled published since 2010?

5 A. I believe the number is somewhere
6 around 3,000.

7 Q. How many YA books set in Alaska have you --
8 has Entangled published?

9 A. I don't know.

10 Q. Has there been any -- any others than Crave?

11 A. I'm sure we have books in Alaska. I know -- I
12 don't know about why you specifically -- I mean, off
13 the top of my head, we have two. But I don't know
14 specifically -- I don't know every YA book that we
15 publish.

16 Q. You have two what?

17 A. Books in Alaska.

18 Q. Are they YA books?

19 A. Those two, no.

20 Q. What are the names of the books?

21 A. One of them is called Arctic Bite and is a
22 vampire in Alaska. Another, I don't know the title of
23 it, but it was -- Samantha Beck was the author. It's
24 about a woman living in Southern California who
25 relocates to Alaska.

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1 thought YA sales were depressed, and the book store
2 managers, a lot of them were saying that, the women
3 who -- the people, but a lot of women write YA
4 romance -- who were writing these heroines were writing
5 the kind of heroine they wish they had been in high
6 school, having agency, understanding who they are,
7 where they want to go, just having all of the answers.
8 And they felt, in their opinion, that's why YA sales
9 had been depressed recently. That young girls couldn't
10 relate to that, they don't have all the answers, they
11 don't know what's going on.

12 And then I read a separate article
13 completely unrelated that was talking about how
14 Twilight was about to be ten years old, and so I had
15 the idea of bringing vampires back. I said, "But we
16 have do it in a fun, fresh way. We need a new angle on
17 it." And my idea was to take Twilight meets Harry
18 Potter and put those two together. So I needed
19 something fish out of water and fantastical and set
20 someplace that, you know, would be its own character.
21 And that's -- I really wanted the romance of Twilight,
22 though, which is like heart-pounding, does he like me,
23 does he not like me, like all of that that was missing
24 that, you know, isn't in a Harry Potter because that
25 was middle grade.